## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

IN RE: CENTURYLINK SALES PRACTICES AND SECURITIES LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:

Civil Action No. 18-296 (MJD/KMM) Civil Action No. 18-297 (MJD/KMM) Civil Action No. 18-298 (MJD/KMM) Civil Action No. 18-299 (MJD/KMM) AFFIDAVIT OF MICHAEL D.
BLATCHLEY IN SUPPORT OF THE
REPLY MEMORANDUM OF LAW
IN FURTHER SUPPORT OF THE
MOTION OF LEAD PLAINTIFF
OREGON FOR CONSOLIDATION
OF RELATED ACTION

- I, Michael D. Blatchley, declare under penalty of perjury as follows:
- 1. I am a member in good standing of the Bars of the State of New York and the State of New Jersey, and am admitted *pro hac vice* to this Court. I am a partner of the law firm Bernstein Litowitz Berger & Grossmann LLP, counsel for Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund ("Oregon"), and Lead Counsel for the Class. I submit this affidavit in support of the Reply Memorandum Of Law In Further Support Of The Motion Of Lead Plaintiff Oregon For Consolidation Of Related Action.
- 2. Attached hereto as Exhibit A is a true and correct copy of Pretrial Order No. 2, ECF No. 30, *Teamsters Local 445 Freight Division Pension Fund v. Bombardier Inc.*, No. 1:05-cv-01898-SAS-GWG (S.D.N.Y. Aug. 29, 2005).

3. Attached hereto as Exhibit B is a true and correct copy of Order, ECF No. 16, *In re Select Comfort Corp. Securities Litigation*, No. 0:99-cv-00884-DSD-SRN (D. Minn. Sept. 21, 1999).

Dated: March 20, 2018 Respectfully submitted,

## /s/ Michael D. Blatchley

John Browne, NYS Bar No. 3922747 Michael D. Blatchley, NYS Bar No. 4747424 BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

1251 Avenue of the Americas New York, NY 10020 Telephone: (212) 554-1400 Facsimile: (212) 554-1444 johnb@blbglaw.com michaelb@blbglaw.com

Keith S. Dubanevich, OSB No. 975200 Timothy S. DeJong, OSB No. 940662 Keil M. Mueller, OSB No. 085535 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.

209 SW Oak Street, Suite 500 Portland, OR 97204 Telephone: (503) 227-1600 Facsimile: (503) 227-6840 kdubanevich@stollberne.com tdejong@stollberne.com kmueller@stollberne.com

Special Assistant Attorneys General and Counsel for Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund, and Lead Counsel for the Class

Richard A. Lockridge, MN No. 64117
Gregg M. Fishbein, MN No. 202009
Kate M. Baxter-Kauf, MN No. 392037
LOCKRIDGE GRINDAL NAUEN P.L.L.P
100 Washington Avenue S, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 596-4044
Facsimile: (612) 339-0981
ralockridge@locklaw.com
gmfishbein@locklaw.com
kmbaxter-kauf@locklaw.com

Local Counsel for Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund